

THOMPSON & KNIGHT LLP
Jennifer A. Christian
900 Third Avenue, 20th Floor
New York, New York 10022
Tel: (212) 751-3001
Fax: (212) 751-3113

*Counsel to Howard Terry and the
Terry Foundation*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re: | : | Chapter 11 |
| | : | |
| LEHMAN BROTHERS HOLDINGS INC., et al., | : | Case No. 08-13555 (JMP) |
| | : | |
| Debtors. | : | (Jointly Administered) |
| -----X | : | |

**RESPONSE OF HOWARD TERRY AND THE TERRY FOUNDATION TO
DEBTORS' EIGHTEENTH OMNIBUS OBJECTION TO CLAIMS
(DUPLICATIVE OF INDENTURE TRUSTEE CLAIMS)**

Howard Terry and the Terry Foundation (together, the "Claimants") hereby file this response to the Debtors' Eighteenth Omnibus Objection to Claims (Duplicative of Indenture Trustee Claims) [Docket Number 9656] and respectfully state as follows:

1. Howard Terry filed proof of claim number 1481 on December 29, 2008 in case number 08-13555 in the amount of \$11,856,000.00.
2. The Terry Foundation filed proof of claim number 1482 on December 29, 2008 in case number 08-13555 in the amount of \$1,500,000.00.
3. The Wilmington Trust Company filed proof of claim number 10082 on September 2, 2009 in case number 08-13555 in the amount of \$73,162,259,495.49.
4. The Debtors objected to claim numbers 1481 and 1482 as duplicative of claim number 10082.

5. Claim numbers 1481 and 1482 contain addendums indicating that the Claimants are not seeking a double recovery, should the indenture trustee file a proof of claim on behalf of all holders.

6. Claimants believe that claim number 10082 filed by the Wilmington Trust Company seeks repayment of the same amounts sought by Claimants in claim numbers 1481 and 1482.

7. However, Claimants decline to withdraw their claims at this time while the claim of the Wilmington Trust Company remains unpaid and subject to objection by the Debtors.

8. Claimants will agree to withdraw their claims upon either (i) allowance of the claim of the Wilmington Trust Company, in full, or (ii) final adjudication of any objection to claim number 10082. Claimants believe that withdrawing claims 1481 and 1482 prior to such action would be premature.

WHEREFORE, Claimants respectfully request that the Court overrule the objection to claim numbers 1481 and 1482 at this time and grant such other and further relief as it deems just and proper.

Dated: New York, New York
July 20, 2010

Respectfully submitted,

THOMPSON & KNIGHT LLP

/s/ Jennifer A. Christian
Jennifer A. Christian
Thompson & Knight LLP
900 Third Avenue, 20th Floor
New York, New York 10022
Tel: (212) 751-3001
Fax: (212) 751-3113

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